

BARNES, RICHARDSON & COLBURN

ATTORNEYS & COUNSELLORS AT LAW

303 EAST WACKER DRIVE

SUITE 1100

CHICAGO, ILLINOIS 60601

TELEPHONE: (312) 565-2000

FACSIMILE: (312) 565-1782; 565-1844

E-MAIL: barnes@bro-chi.com

<http://www.barnesrichardson.com>

RUFUS E. JARMAN, JR.*
JAMES S. O'KELLY*
ROBERT E. BURKE
DONALD J. UNGER
MATTHEW T. McGRATH*
SANDRA LISS FRIEDMAN*
BRIAN F. WALSH
KAZUMUNE V. KANO
F.D. VAN ARNAM, JR.*
LAWRENCE M. FRIEDMAN
ALAN GOGGINS*
ROBERT A. SHAPIRO*

CAROLYN D. AMADON
STEPHEN W. BROPHY*
MICHAEL J. CHESSLER
TSIONA COHEN*
JAMES B. DORAN*
DAVID G. FORGUE
YVONNE M. HILST
BEATA KOLOSA
KEVIN W. LEONARD*
SHANNON N. RICKARD
WM. RANDOLPH RUCKER
JOSEPH M. SPRARAGEN*
JANE E. WELSH
JOHN ZINCANI*

475 PARK AVENUE SOUTH
NEW YORK, N.Y. 10016
TEL. (212) 725-0200
FACSIMILE (212) 889-4135

1225 EYE STREET, N.W.
SUITE 1150
WASHINGTON, D.C. 20005
TEL. (202) 457-0300
FACSIMILE (202) 331-8746

SPECIAL COUNSEL
ANSIS M. HELMANIS*

OF COUNSEL
DAVID O. ELLIOTT*
GUNTER VON CONRAD*

KARIN M. BURKE*
ROBERT F. SEELY

INTERNATIONAL TRADE ANALYSTS
TRACI L. GREVER
AMY H. WARLICK

*NOT ADMITTED IN ILLINOIS

November 13, 2001

PUBLIC VERSION

VIA ELECTRONIC MAIL

PUBLIC VERSION

Re: Request for Exclusion From Import Relief Under Section 203
Certain Corrosion-Resistant Carbon Steel Flat Products from Japan

Dear Ms. Blue:

On behalf of Dana Glacier Daido America, LLC ("Dana"), we hereby request exclusion from import relief under Section 203 of the Trade Act of 1974, as amended, (19 U.S.C. 2252).

Pursuant to the notice published by the Trade Policy Staff Committee, 66 Fed. Reg. 54321 (Oct. 26, 2001), we are providing the following information:

(a) The designation of the product under a recognized standard or certification(e.g., ASTM, DIN), or the commercial name for the product and the HTS number under which the product enters the United States;

Dana's clad aluminum to steel strip is a proprietary product which is not produced anywhere else. The product is referred to as "Aluminum clad steel strips in coils," and are imported under HTSUS subheading 7212.60.0000. These imported articles are used for making automotive products, such as connecting rod and crankshaft main insert bearings. Dana's material is currently imported in coiled form. The material is flat rolled carbon steel with aluminum cladding. This is a proprietary product which is not produced anywhere else.

(b) A description of the product based on physical characteristics (e.g., chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the product from products for which exclusion is not sought;

These imported articles are used for making automotive products, such as connecting rod and crankshaft main insert bearings. Dana's material is currently imported in coiled form. The material is flat rolled carbon steel with aluminum cladding. The material is flat rolled carbon steel with aluminum cladding. The dimensions and specifications of the imported product that is the subject of this request are as follows:

Overall Thickness:	Minimum of and including 1.10mm to a maximum of and including 4.90mm
---------------------------	--

Overall Width:	Minimum of and including 76.00mm to a maximum of and including 250.00mm
-----------------------	---

Composition:

Steel back (SAE 1005):	C	under 0.10%
	Mn	under 0.40%
	P	under 0.04%
	S	under 0.05%
	Si	under 0.05%

Aluminum cladding:	Cu	under 2.51%
	Sn	under 15.10%
	Pb	under 2.0%
	Sb	under 0.50%
	Si	under 3.0%
	Total other: less than 1.25% (including iron)	
	Al	Remainder

(c) The basis for requesting an exclusion;

This exclusion is being requested on the basis that this product is not known to have yet been produced in the United States, nor has there any indication that any domestic producer is able or willing to produce this particular product at the present time. Dana would suffer serious harm if it is not able to source this material or if it is required to pay additional duties.

(d) The names and locations of any producers, in the United States and foreign countries, of the product;

To the best of our knowledge, there are no U.S. producers of this material. The only known producer is Daido Metal Co., Ltd., located in Japan at the following address:

Bimetal Division
Tendoh Shinden, Maehara
Inuyama, Aichi 484-0061, Japan

(e) Total U.S. consumption of the product, if any, by quantity and value for each year from 1996 to 2000, and projected annual consumption for each year from 2001 to 2005, with an explanation of the basis for the projection;

The material began to be imported into the United States in 1999. At this time, the projected annual consumption of the material extends only until 2003. This projection is based upon projected sales and contracts with current customers for that period. The estimated value for the years 1999 through 2003 is based upon the price of [*****]. Information pertaining to the quantity and value of the U.S. consumption during these years is as follows:

<u>Year</u>	<u>Estimated Quantity</u>	<u>Estimated Value (in U.S. dollars)</u>
1999	[*****]	[*****]
2000	[*****]	[*****]
2001	[*****]	[*****]
2002	[*****]	[*****]
2003	[*****]	[*****]

* Figures in brackets [] contain information for both the estimated quantity and value, and are indicative of production of the material as a whole. Business confidential treatment is therefore requested.

(f) Total U.S. production of the product for each year from 1996 to 2000, if any; and

To the best of our knowledge, there had been no U.S. production of this material during at any time during the period stated.

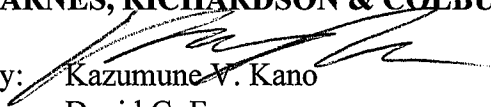
(g) The identity of any U.S. produced substitutes for the product, total U.S. production of the substitute for each year from 1996 to 2000, and the names of any U.S. producers of the substitute.

Both presently and including the period stated above, there has been no known domestically produced substitutes in the United States for this product.

Thank you for your cooperation in this matter. Please contact us if you have any questions about this request or if you require additional information.

Very truly yours,

BARNES, RICHARDSON & COLBURN

By:  Kazumune V. Kano
David G. Forgue
William J. Murphy